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Attorney Docket No.: 10992667-1

REMARKS

In response to the Office Action dated May 21, 2004, claims 1 and 11 have been amended. Claims 1-19 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

The Office Action rejected claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over Akada (U.S. Patent No. 6,392,680) in view of Lenz (U.S. Patent No. 6,512,594). The Office Action rejected claims 1 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Garrison (U.S. Patent No. 5,595,403) in view of Lenz (U.S. Patent No. 6,512,594). The Office Action rejected claims 2-10 and 12-19 under 35 U.S.C. § 103(a) as being unpatentable over Garrison (U.S. Patent No. 5,595,403) in view of Lenz (U.S. Patent No. 6,512,594) as applied to claims 1 and 11 and further in view of Akada (U.S. Patent No. 6,392,680).

With regard to claims 1-10, the Applicants respectfully submit that the combined cited references do not disclose, teach, or suggest all of the features of the claimed invention. For example, unlike the cited references, claim 1 recites in part an inkjet printing device having "...a processor configured to receive input images that define the identification card and to translate and transpose the input images into reverse images...and...an inkjet printhead coupled to the processor and configured to receive and print the reverse images on portions of the transparent media..."

With regard to claims 11-19, the Applicants respectfully submit that the combined cited references do not disclose, teach, or suggest all of the features of the claimed invention. For instance, unlike the cited references, claim 11 recites in part "...creating a digital file on the host computer having images and text...translating and transposing, with the processor, the images and the text to define reversed data...sending the reversed data to the inkjet printhead to be printed by the inkjet printing device that includes an input area for holding transparent media...and...printing the reversed data on a portion of the transparent media with the inkjet printhead."

Hence, the cited references, in combination or alone, do **not** disclose, teach or suggest the Applicants' claimed inkjet printer having a processor of claims 1-10 and a computer processor sending the reversed data to the inkjet printhead of claims 11-19.

In addition, although the Lenz reference states on col. 2, lines 53-54 "[O]ther

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aspects include use with direct card printing and ink jet techniques", as argued by the Examiner, Lenz's sole disclosure of the phrase "ink jet techniques" cannot be taken out of context by the Examiner. For example, the above statement was disclosed in the same context and paragraph that contained a discussion of standard card printers that use ribbon ink printing techniques, which is very different from the Applicant's claimed inkjet printer.

In particular, Lenz explicitly refers to typical ink printing techniques, and continues on col. 2, lines 54-57 to state "[R]ibbon 44 moves between reels 46 and its position is sensed by controller 12 using a sensor 48. Web 42 moves between reels 50 onto the control of controller 48 which senses the position of web 50 using sensors 52." As such, since the Lenz's reference to "ink jet techniques" is unclear and appears to be made in passing, it cannot be interpreted too broadly and must be kept within the context that it is disclosed within. In re Wesslau, 353 F.2d 238, 147 USPQ 391 (CCPA 1965). The Examiner is reminded that hindsight cannot be used to take the disclosure of a single phrase out of context and assume the presence of the Applicants' claimed inkjet printer having a processor of claims 1-10 and a computer processor sending the reversed data to the inkjet printhead. Bausch & Lomb, Inc. v. Barnes-Hind/Hydrocurve, Inc., 796 F.2d 443, 230 USPQ 416 (Fed. Cir. 1986).

Accordingly, the combined cited references cannot render the Applicants' invention obvious. This failure of the cited references to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness (MPEP 2143).

With regard to the rejection of the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

In view of the arguments and amendments set forth above, the Applicants respectfully submit that the rejected claims are in immediate condition for allowance. The Examiner is therefore respectfully requested to withdraw the outstanding claim rejections and to pass this application to issue. Additionally, in an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the

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Examiner to telephone the Applicants' attorney at (818) 885-1575. Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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